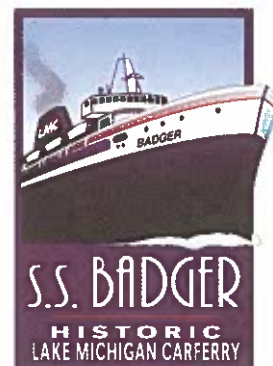


US EPA ARCHIVE DOCUMENT

November 19, 2013



**VIA FIRST CLASS U.S. MAIL**

Chief, Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
P.O. Box 7611, Ben Franklin Station  
Washington, D.C. 20044-7611

Director, Water Enforcement Division  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
Mail Code 2243A  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Director, Water Division  
U.S. Environmental Protection Agency, Region 5  
77 W. Jackson Blvd. (W-15J)  
Chicago, IL 60604

Re: *United States v. Lake Michigan Trans-Lake Shortcut, Inc., d/b/a Lake Michigan Carferry Service and S.S. Badger*, No. 1:13-cv-317, DOJ Case No. 90-5-1-1-10771 (W.D. Mich.)

Dear Sir or Madam:

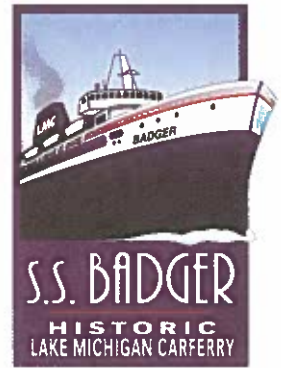
Pursuant to the notification requirement in Paragraph 30 of the Consent Decree in *United States v. Lake Michigan Trans-Lake Shortcut, Inc., d/b/a Lake Michigan Carferry Service and S.S. Badger*, Civil Action No. 13-00317 (W.D. Mich. entered into Oct. 10, 2013), attached please find a copy of Lake Michigan Carferry's ("LMC's") application and supporting documentation submitted to the American Bureau of Shipping seeking approval to replace boiler fronts as a preliminary step towards installing combustion control technology on the Badger. Combustion control technology is being designed and installed on the Badger in order to meet the interim effluent limits set forth in Appendix A to the Consent Decree. LMC anticipates engineering and installation of the boiler fronts to be completed before the start of the 2014 Operating Season.

Please do not hesitate to contact me if you have questions or require additional information.

Very truly yours,

*Charles R. Leonard*

Charles R. Leonard  
Vice-President, Navigation  
Lake Michigan Carferry Service



Attachment

## Chuck Leonard

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**From:** Marine Shop [REDACTED]  
**Sent:** Thursday, November 14, 2013 3:32 PM  
**To:** Bklages@eagle.org  
**Cc:** LMC Leonard  
**Subject:** Badger  
**Attachments:** Consent Decree.pdf; Consent Decree Amendment.pdf; Stokerfront1.pdf; Stokerfront2.pdf; Charles Cart.vcf

Brian,

In an agreement with the EPA and the Department of Justice prompted by the adoption of the Vessel General Permit system for vessel discharges, *Badger* will be allowed to keep her current coal fuel by improving the combustion controls for the boilers (this winter) and installing an "Ash Retention" system to capture the coal ash and allow it to be transported to a certified landfill (winter of 2014-15). I'm sure none of this is truly news to you, however I wanted to let you know what our intentions are and what our current position is.

We have been working with G.R. Bowler Co. (they did the Calloway system) to design an Automated Combustion Control system to improve fuel combustion aboard the vessel. The vessel originally had a system built by General Regulator which has become inoperable over the years. Bowler is working to the ABS Guide for Ships Burning Coal as well as the applicable CFR's and other relevant codes and we are near to a final initial design with them, after which John Chapman can generate the necessary drawings and the package will be submitted to ABS and USCG.

In preparation for installation of the new control system we are working to replace the coal feeders and renovate the combustion air systems.

As the original manufacturer of the coal feeders is no longer in business we will replace them with units made by Detroit Stoker Company. These units will mount in the same frame as the existing feeders, however the boiler fronts that the frame mounts to are in poor condition and we will want to replace them as well. Detroit Stoker has offered replacement boiler fronts made from A-36 steel as the original cast fronts are unavailable. I propose instead to manufacture the four fronts in-house using 0.750" ABS Grade A/ A-36 plate. This I believe will equal or exceed the structure of the original 0.750" cast iron fronts and allow the fronts to be constructed to conform to the existing conditions to avoid the need for field changes. To install the replacement boiler fronts we will need only to remove the piers and arches as the original refractory tiles are mounted on structure that will not be disturbed.

In renewing the combustion air system the existing forced draft and induced draft fans will be retained and new output controls installed. The over-fire air system will be replaced with new fans and nozzles, an additional fan will supply a larger percentage of over-fire air in the total combustion air to improve combustion of coal fines in the fuel. This renewal/ upgrade will require that the refractory protecting the mud-drum be removed and replaced.

I have attached the original drawings and a sketch of the boiler fronts to help identify the location.

I would welcome your comments and any input from Houston as well. I have not as yet been in contact with anyone there.

I have attached .PDF files of the consent decree for your review as the EPA has directed us to provide them to all involved. Our V.P., Mr. Chuck Leonard, has requested that he receive an e-mail acknowledgment of receipt at

Kind regards,

Chuck



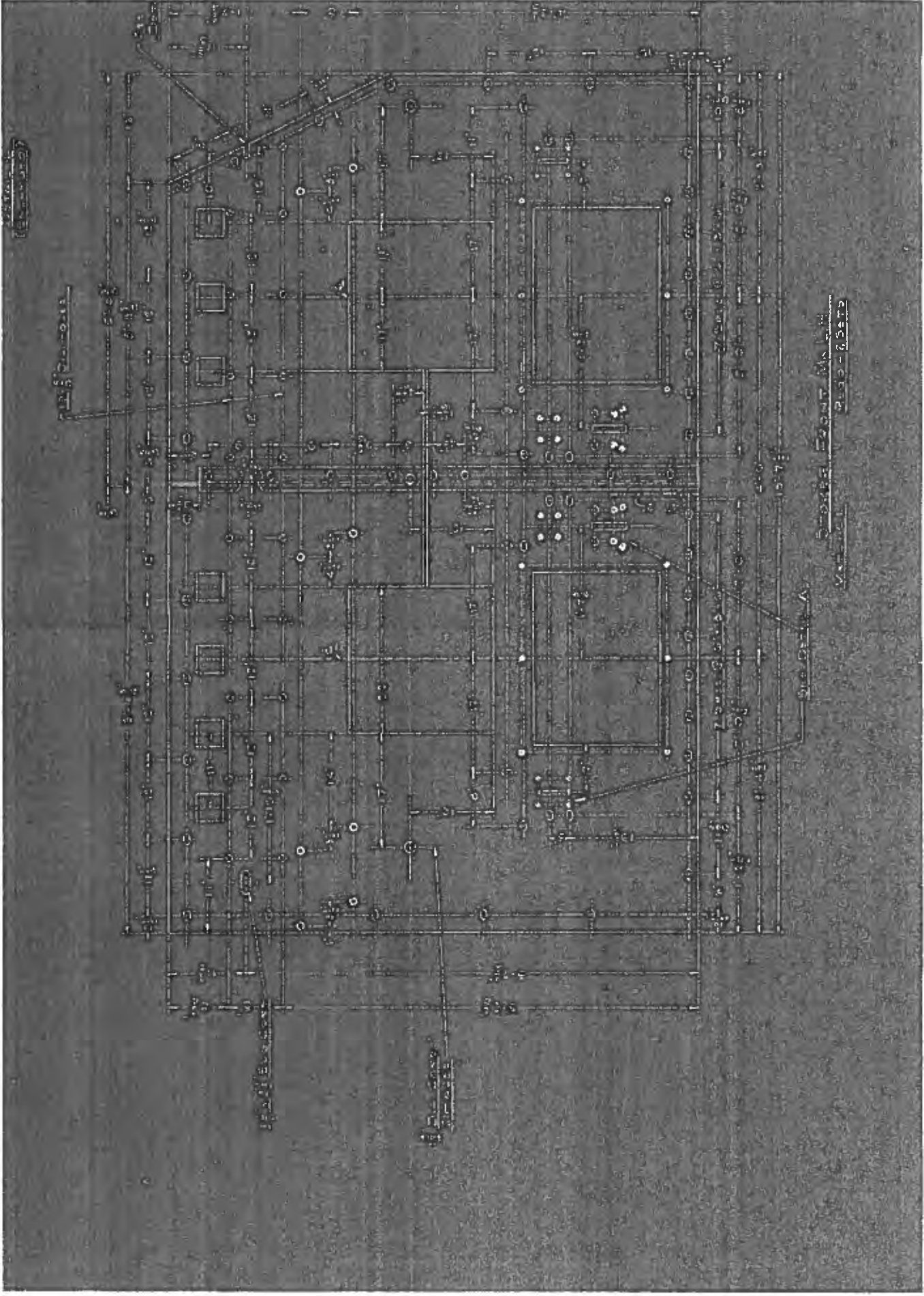
**Charles Cart**

Senior Chief Engineer

701 Maritime Drive  
Ludington, MI 49431

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]





CONTROL PANEL LAYOUT  
SCALE - 1/8" = 1"